

**REMARKS**

This amendment responds to the Office Action mailed on April 16, 2003, which rejects claims 1-16 and 18 and objects to claim 17. Claims 1-3, 6 and 12 have been amended. Claims 19-44 have been added. No new matter has been added. Applicants respectfully submit that the application is now in condition for allowance. Accordingly, Applicants request reconsideration, removal of the objection and rejections, and allowance of all of the pending claims.

**AMENDMENTS**

Claims 1-3, 6 and 12 have been amended. Claims 19-44 have been added. The specification provides support for the amendments, and the new claims, for example, but not limited to, at one or more portions of FIGS. 5-11 and/or one or more portions of page 8, line 10-page 25, line 9.

**CLAIM OBJECTIONS**

Paragraph 3 of the Office Action objects to claim 17 as being dependent upon a rejected base claim and states that claim 17 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants appreciate the finding of allowable subject matter in original claim 17. The subject matter of original claim 17 is now presented in independent claim 44. Accordingly, allowance of independent claim 44 is respectfully requested.

**CLAIM REJECTIONS**

Paragraph 3 of the Office Action rejects claims 1-16 and 18 under 35 U.S.C. 102(b) as being anticipated by Siemon et al. (U.S. Patent No. 5,459,643).

Applicants traverse the rejection of claims 1-16 and 18, as amended.

**CLAIMS 1-5**

Claim 1, as amended recites “[a] device for use in transfer of data signals between media having a plurality of electrically conductive signal carrying elements, wherein capacitive and

inductive coupling due to the position of elements causes electrical noise in the signals, the device comprising: (a) a dielectric support member; (b) a means, disposed on the dielectric support member, for receiving and transmitting signals from the signal carrying elements; (c) a means for producing capacitance for reducing the electrical noise prior to transmitting the signals; and (d) means for electrically connecting the means for producing capacitance and the means for receiving and transmitting signals, wherein said means for electrically connecting includes a plurality of electrically conductive, dual compliant pins.”

Siemon et al. does not teach or suggest a device with the recited “means for electrically connecting the means for producing capacitance and the means for receiving and transmitting signals, wherein said means for electrically connecting includes a plurality of electrically conductive, dual compliant pins”, as recited in amended claim 1.

Siemon et al. disclose a wiring block 100 that has two rows of connecting blocks 108 with contacts 228 and capacitive elements that are electrically connected between select leads of the blocks. The capacitive elements are designed to compensate for capacitive imbalance caused by the blocks (Abstract, lines 11-12, 15-16; col. 8, lines 3-10; col. 9, line 14-col. 10, line 55; FIGS. 1A-4E).

However, Siemon et al. do not teach or suggest the use of a plurality of electrically conductive, dual compliant pins in the electrical connections between the blocks or contacts and the capacitive elements.

Consequently, even if the blocks 108 or contacts 228 constitute a means for receiving and transmitting signals, which Applicants do not admit, and even if the capacitive elements constitute a means for producing capacitance for reducing the electrical noise prior to transmitting the signals, which Applicants do not admit, Siemon et al. can not possibly teach or suggest a “means for electrically connecting the means for producing capacitance and the means for receiving and transmitting signals, wherein said means for electrically connecting includes a plurality of electrically conductive, dual compliant pins”, as recited in amended claim 1.

Thus, Siemon et al. do not teach or suggest “[a] device for use in transfer of data signals between media having a plurality of electrically conductive signal carrying elements, wherein capacitive and inductive coupling due to the position of elements causes electrical noise in the signals, the device comprising: (a) a dielectric support member; (b) a means, disposed on the dielectric support member, for receiving and transmitting signals from the signal carrying

elements; (c) a means for producing capacitance for reducing the electrical noise prior to transmitting the signals; and (d) means for electrically connecting the means for producing capacitance and the means for receiving and transmitting signals, wherein said means for electrically connecting includes a plurality of electrically conductive, dual compliant pins”, as recited in amended claim 1.

Accordingly, reconsideration and allowance of claim 1, as amended, is respectfully requested.

Claims 2-5 depend from claim 1 and are therefore patentable for at least the same reasons as stated above for claim 1. Accordingly, reconsideration and allowance of claims 2-9 is respectfully requested.

### **CLAIMS 7-11**

Claim 6, as amended, recites “[a] device for reducing crosstalk noise in an insulation displacement contact assembly connectable with media having a plurality of signal carrying elements, the device comprising: (a) a dielectric support member; (b) a plurality of electrically conductive members disposed on the support member; and (c) a plurality of electrically conductive, dual compliant pins for electrically connecting the insulation displacement contact assembly and the plurality of electrically conductive members; wherein the plurality of electrically conductive members are in a positional relationship with respect to each other to produce capacitance for reducing the crosstalk noise.”

Siemon et al. do not teach or suggest “a plurality of electrically conductive, dual compliant pins for electrically connecting the insulation displacement contact assembly and the plurality of electrically conductive members” that are in “positional relationship with respect to each other to produce capacitance for reducing crosstalk noise”, as recited in amended claim 6.

As stated above, Siemon et al. disclose a wiring block 100 that has two rows of connecting blocks 108 with contacts 228 and capacitive elements that are electrically connected between select leads of the blocks.

However, Siemon et al. do not teach or suggest the use of a plurality of electrically conductive, dual compliant pins in the electrical connections between the blocks or contacts and the capacitive elements.

Consequently, even if the capacitive elements constitute electrically conductive members that are in positional relationship with respect to each other to produce capacitance for reducing crosstalk noise, which Applicants do not admit, Siemon et al. can not possibly teach or suggest “a plurality of electrically conductive, dual compliant pins for electrically connecting the insulation displacement contact assembly and the plurality of electrically conductive members” that are in “positional relationship with respect to each other to produce capacitance for reducing crosstalk noise”, as recited in amended claim 6.

Thus, Siemon et al. do not teach or suggest “[a] device for reducing crosstalk noise in an insulation displacement contact assembly connectable with media having a plurality of signal carrying elements, the device comprising: (a) a dielectric support member; (b) a plurality of electrically conductive members disposed on the support member; and (c) a plurality of electrically conductive, dual compliant pins for electrically connecting the insulation displacement contact assembly and the plurality of electrically conductive members; wherein the plurality of electrically conductive members are in a positional relationship with respect to each other to produce capacitance for reducing the crosstalk noise”, as recited in amended claim 6.

Accordingly, reconsideration and allowance of claim 6, as amended, is respectfully requested.

Claims 7-11 depend from claim 6 and are therefore patentable for at least the same reasons as stated above for claim 6. Accordingly, reconsideration and allowance of claims 7-11 is respectfully requested.

### **CLAIMS 12-18**

Claim 12, as amended recites “[a] system for use in transfer of data signals between media cables having signal carrying elements, the system comprising: (a) an insulation displacement contact assembly having a first dielectric support member and a plurality of electrically conductive members disposed thereon, wherein each of the plurality of electrically conductive members have first and second wire insulation cutting contacts for connecting with respective signal carrying elements of the signal carrying elements associated with the media cables; and (b) a printed circuit board having a second dielectric support member and electrically conductive traces disposed thereon being connectable with the electrically conductive members, wherein the traces have portions in positional relationships with respect to each other for forming reactance between the

electrically conductive members to reduce electrical noise introduced by the transfer of data signal between media cables.”

Siemon et al. do not teach or suggest a “contact assembly having a first dielectric support member and a plurality of electrically conductive members disposed thereon” and “a printed circuit board having a second dielectric support member and electrically conductive traces disposed thereon . . . for forming reactance between the electrically conductive members to reduce electrical noise, as recited in amended claim 12.

As stated above, Siemon et al. disclose a wiring block 100 that has two rows of connecting blocks 108 with contacts 228 and capacitive elements that are electrically connected between select leads of the blocks.

However, the block and contacts and capacitive elements are all disposed on a single support member, i.e., printed circuit board 106.

Consequently, even if the blocks or contacts constitute electrically conductive members, and even if the capacitive elements constitute electrically conductive members for forming reactance between the electrically conductive members to reduce electrical noise, which Applicants do not admit, Siemon et al. can not possibly teach or suggest a “contact assembly having a first dielectric support member and a plurality of electrically conductive members disposed thereon” and “a printed circuit board having a second dielectric support member and electrically conductive traces disposed thereon . . . for forming reactance between the electrically conductive members to reduce electrical noise”, as recited in amended claim 12.

Thus, Siemon et al. do not teach or suggest “[a] system for use in transfer of data signals between media cables having signal carrying elements, the system comprising: (a) an insulation displacement contact assembly having a first dielectric support member and a plurality of electrically conductive members disposed thereon, wherein each of the plurality of electrically conductive members have first and second wire insulation cutting contacts for connecting with respective signal carrying elements of the signal carrying elements associated with the media cables; and (b) a printed circuit board having a second dielectric support member and electrically conductive traces disposed thereon being connectable with the electrically conductive members, wherein the traces have portions in positional relationships with respect to each other for forming reactance between the electrically conductive members to reduce electrical noise introduced by the transfer of data signal between media cables”, as recited in amended claim 12.

Accordingly, reconsideration and allowance of claim 12, as amended, is respectfully requested.

Claims 13-18 depend from claim 12 and are therefore patentable for at least the same reasons as stated above for claim 12. Accordingly, reconsideration and allowance of claims 13-18 is respectfully requested.

### **CLAIMS 19-30**

Claim 19 depends from claim 1 and is therefore patentable for at least the same reasons as stated above for claim 1.

Claims 20-21 depend from claim 6 and are therefore patentable for at least the same reasons as stated above for claim 6.

Claims 22-30 depend from claim 12 and are therefore patentable for at least the same reasons as stated above for claim 12.

### **CLAIMS 31-41**

Claim 31 recites “[a] system for transfer of data signals between media cables having signal carrying elements, the system comprising: (a) a contact assembly having a first plurality of electrically conductive members each having a first engagement portion for connecting with a first respective signal carrying element of the signal carrying elements, a second engagement portion for connecting with a second respective signal carrying element of the signal carrying elements associated with the media cables, and a connection portion for electrically connecting the first engagement portion and the second engagement portion; and (b) a printed circuit board including a second plurality of electrically conductive members that are electrically connected to the first plurality of electrically conductive members by way of the connection portions and form reactance between the first plurality of electrically conductive members to reduce electrical noise introduced by the transfer of data signal between media cables.”

Siemon et al. do not teach or suggest a system with a first plurality of electrically conductive members each having first and second engagement portions “and a connection portion for electrically connecting the first engagement portion and the second engagement portion” and “a second plurality of electrically conductive members that are electrically connected to the first

plurality of electrically conductive members by way of the connection portions and form reactance between the first plurality of electrically conductive members”, as recited in claim 31.

As stated above, Siemon et al. disclose a wiring block 100 that has rows of connecting blocks 108 with contacts 228 and capacitive elements that are electrically connected between select leads of the blocks.

However, the traces that form the capacitive elements are in the only electrical connection paths between the input contacts and the output contacts.

Consequently, Siemon et al. can not possibly teach or suggest a system with a first plurality of electrically conductive members each having first and second engagement portions “and a connection portion for electrically connecting the first engagement portion and the second engagement portion” and “a second plurality of electrically conductive members that are electrically connected to the first plurality of electrically conductive members by way of the connection portions and form reactance between the first plurality of electrically conductive members”, as recited in claim 31.

Thus, Siemon et al. do not teach or suggest “[a] system for transfer of data signals between media cables having signal carrying elements, the system comprising: (a) a contact assembly having a first plurality of electrically conductive members each having a first engagement portion for connecting with a first respective signal carrying element of the signal carrying elements, a second engagement portion for connecting with a second respective signal carrying element of the signal carrying elements associated with the media cables, and a connection portion for electrically connecting the first engagement portion and the second engagement portion; and (b) a printed circuit board including a second plurality of electrically conductive members that are electrically connected to the first plurality of electrically conductive members by way of the connection portions and form reactance between the first plurality of electrically conductive members to reduce electrical noise introduced by the transfer of data signal between media cables”, as recited in claim 31.

Accordingly, allowance of claim 31, is respectfully requested.

Claims 32-41 depend from claim 31 and are therefore patentable for at least the same reasons as stated above for claim 31. Accordingly, allowance of claims 32-41 is respectfully requested.

**CLAIMS 42-43**

Claims 42 and 43 also recite ““[a] system for transfer of data signals between media cables having signal carrying elements, the system comprising: (a) a contact assembly having a first plurality of electrically conductive members each having a first engagement portion for connecting with a first respective signal carrying element of the signal carrying elements, a second engagement portion for connecting with a second respective signal carrying element of the signal carrying elements associated with the media cables, and a connection portion for electrically connecting the first engagement portion and the second engagement portion; and (b) a printed circuit board including a second plurality of electrically conductive members that are electrically connected to the first plurality of electrically conductive members by way of the connection portions and form reactance between the first plurality of electrically conductive members” and are therefore patentable for at least the reasons stated above with respect to claim 31.

Accordingly, allowance of claims 42-43, is respectfully requested.

**CLAIMS 44**

As stated above, claim 44 recites the subject matter of original claim 17, which the Examiner has deemed allowable.

**CONCLUSION**

This application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

Because the reasons above are sufficient to traverse the rejections, Applicants have not explored, nor do they now present, other possible reasons for traversing such rejections. Nonetheless, Applicants expressly reserve the right to do so, if appropriate, in response to any future Office Actions.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time.

Respectfully submitted,

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By

  
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